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April 20, 1995

Ms. Susan Pastor
Community Involvement Coordinator
Office of Public Affairs
U.S. EPA, Region V
77 W. Jackson Blvd.
Chicago, IL 60604

RE: NL Industries/Taracorp Superfund Site
Granite City, Illinois
Comments on the February, 1995 Proposed Plan


Dear Ms. Pastor:

Enclosed please find the comments submitted by Mr. Craig Tarpoff with regard to the above described plan. These comments are for inclusion in the administrative record on my behalf. Thank you for your attention to the matter.

Sincerely,

Enclosure

cc: Lou Bonacorsi
Jack Grady



Craig Tarpoff

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In the early 1980's, IEPA released a report identifying ground water problems under the Taracorp pile. IEPA also identified levels of soil contamination 15 feet underground at the upper levels of the water table. IEPA suggested that these problems might be the result of lead leaching from the pile. IEPA recommended further study to determine the cause of these problems.

In the mid 1980's, U.S. EPA took over activities at the site. Previous work done by IEPA was ignored. Studies funded by NL Industries, a PRP, and accepted by U.S. EPA indicated no ground water contamination. Water samples tested in these studies were first screened through a .45 micron filter. Filters available at hardware stores that reduce over 90 percent of lead in home water systems are five (5) micron screens. PRP studies were taking water samples, removing the lead, and then testing for lead. The U.S. EPA was so confident in the studies done by the PRPs, that a high level Region V administrator testifying before a U.S. House of Representatives sub-committee, swore there was no ground water contamination.

This brings about the first set of questions.

1. Why should we believe the accuracy of the U.S. EPA's most recent assessment of the ground water problems under the Taracorp pile?
2. What is the contingency plan if you are wrong again?
3. Will the contingency plan be activated automatically should

your chosen remedy fail?

4. Does the U.S. EPA really support the permanent placement of hazardous and toxic material in a landfill with no liner?

It was very disappointing that U.S. EPA was unable to answer questions regarding the proposed remedy at the public hearing held on this subject. Concerning the cost estimates for treating the ground water, the following questions need answers:

1. How many new wells will be bored?
2. How many gallons per day will be pumped?
3. How much will treatment of this waste cost per year?
4. Can the local wastewater treatment plant handle this volume of material without affecting the classification of the sludge produced at the plant?
5. Is the cost estimate to drill new wells, construct, if necessary, a pretreatment facility, pump, transport and treat the wastewater for 30 years accurate?

It was very disturbing to hear Project Manager, Brad Bradley, state publicly that because drinking water is not taken from this underground water, little risk exists. Small business, industry, state, and local governments have spent millions of dollars protecting the quality of our underground water supply. While drinking water may not presently come from this water supply, many small wells pump thousand of gallons of this water onto gardens and lawns. This raises the Question, again unanswered, as to the threat or impact to the public health by virtue of the U.S. EPA's proposal.

Without removing the source of the groundwater contamination, there will be no permanent solution. By not removing the pile, the U.S. EPA is gambling with the future development of the city and individual property values of the surrounding area. Capping the pile will, in the short term, eliminate the airborne contamination blowing off the pile. In the long term, the possible need to remove the pile, if the proposed groundwater remedy fails, will be devastating to the area. Remediated properties will be recontaminated, property values will again plummet, and the stigma of Superfund will return.

As stated previously, no residential remediation in the vicinity of the pile should be done until the heavily contaminated parking lot and pile are remediated. The possibility of recontamination by airborne emissions due to construction activities is very real. I ask that you make the only real permanent choice - remove the pile.

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